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14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION
18

19 In re: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Master Docket No. M:07-cv-1827-SI

20
21 This Document Relates to:

22 *Motorola Mobility, Inc. v. AU Optronics*
Corporation, et al., Case No. 3:09-cv-5840-SI

23 *Target Corporation, et al. v. AU Optronics*
24 *Corporation, et al., Case No. CV:10-4945 SI*

25 *AT&T Mobility LLC, et al. v. AU Optronics*
26 *Corporation, et al., C 09-4997 SI*

27 Defendants.
28

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DISCOVERY
CUTOFF AS TO DEPOSITION OF WOO
JONG LEE**

1 Whereas, plaintiffs Motorola Mobility, Inc.; Target Corporation; Sears, Roebuck and Co.;
2 Kmart Corporation; Old Comp Inc.; Good Guys, Inc.; RadioShack Corporation; Newegg Inc.;
3 AT&T Mobility, LLC; AT&T Corp.; AT&T Services, Inc.; BellSouth Telecommunications, Inc.;
4 Pacific Bell Telephone Company; AT&T Operations, Inc.; AT&T DataComm, Inc.; and
5 Southwestern Bell Telephone Company ("Plaintiffs") have requested the depositions of Woo Jong
6 Lee and Richard Ha, former employees of defendants Samsung SDI Co., Ltd. and Samsung SDI
7 America, Inc. ("SDI");

8 Whereas, SDI has requested that Plaintiffs complete the deposition of another former SDI
9 employee on December 7, 2011, before deciding whether to pursue the deposition of Mr. Lee;

10 Whereas the parties are in discussions regarding the deposition of Mr. Ha;

11 Whereas, the fact discovery cut-off in the Direct Action Plaintiffs' track one cases is
12 December 8, 2011;

13 THEREFORE, SDI, by its counsel, and Plaintiffs, by their counsel, stipulate and agree as
14 follows:

15 1. The fact discovery cutoff date of December 8, 2011 set forth in the Order
16 Modifying Pretrial Schedule for "Track One" Direct Action Plaintiff and State Attorney General
17 Cases (MDL Dkt. No. 3110) is extended up to and including January 31, 2012, solely to allow
18 Plaintiffs to seek and, as necessary and/or agreed, take the depositions of Woo Jong Lee and
19 Richard Ha.

20 2. If disputes arise at the deposition, Plaintiffs will have five court days to move to
21 compel further responses.

1 Dated: December 8, 2011

2 /s/ Nathanial J. Wood

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24 *Mobility, LLC, AT&T Corp., AT&T Services, Inc.,*
25 *BellSouth Telecommunications, Inc., Pacific Bell*
26 *Telephone Company, AT&T Operations, Inc., AT&T*
27 *DataComm, Inc., and Southwestern Bell Telephone*
28 *Company; Target Corporation; Sears,*
Roebuck and Co.; Kmart Corporation; Old Comp
Inc.; Good Guys, Inc.; RadioShack Corporation;
and Newegg Inc.

29 /s/ Michael W. Scarborough

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40 *and Samsung SDI Co., Ltd.*

1 IT IS SO ORDERED.

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3 Dated: 12/12, 2011

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7 Susan Illston, United States District Judge

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